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SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

#### ANNUAL AUDITED REPORT FORM X-17A-5 PART III

Washington, DC

OMB APPROVAL

OMB Number:

er: 3235-0123 February 28, 2010

Expires: February 28, 20 Estimated average burden

hours per response..... 12.00

SEC FILE NUMBER

**8**- 67058

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Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGIN	01/01/07 NING AND	ENDING 12/3	1/07 
REPORT TOR THE TERROR BEON	MM/DD/YY	MM/DD/YY	
A	A. REGISTRANT IDENTIFICATION	٧	
NAME OF BROKER-DEALER: SUM	NBELT NEW ENGLAND EQUITIES, LLC		OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE O	OF BUSINESS: (Do not use P.O. Box No.)		FIRM I.D. NO.
	(No. and Street)		
WOBURN	MA	01801	
(City)	(State)	(Zi <sub>j</sub>	Code)
NAME AND TELEPHONE NUMBER KEVIN BOYLE	R OF PERSON TO CONTACT IN REGARD	(7	PRT (81) 932-7355 (rea Code – Telephone Number
В	. ACCOUNTANT IDENTIFICATION	N	
INDEPENDENT PUBLIC ACCOUNT BRACE & ASSOCIATES, PLLC	TANT whose opinion is contained in this Rep	ort*	
	(Name - if individual, state last, first, middle	name)	
PMB 271, 44 NASHUA RD, STE 15	LONDONDERRY	NH	03053
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:		PROCESSED	
☑ Certified Public Accoun	ntant	FEB 25	onno ()
☐ Public Accountant			
☐ Accountant not resident	in United States or any of its possessions.	THOMS: FINANC	
	FOR OFFICIAL USE ONLY		
	FOR OFFICIAL USE ONLY		

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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#### OATH OR AFFIRMATION

I. KEVIN BOYLE	, swear (or affirm) that, to the best of
my knowledge and belief the accompanying f SUNBELT NEW ENGLAND EQUITIES, LLC	financial statement and supporting schedules pertaining to the firm of , as
of DECEMBER 31	, 20 07 , are true and correct. I further swear (or affirm) that
neither the company nor any partner, proprie classified solely as that of a customer, except	etor, principal officer or director has any proprietary interest in any account as follows:
MY COMMISSION Z	Hen Bull Signature
The state of the s	PRESIDENT  Title
<ul> <li>☐ (f) Statement of Changes in Liabilities S</li> <li>☑ (g) Computation of Net Capital.</li> <li>☐ (h) Computation for Determination of R</li> <li>☑ (i) Information Relating to the Possessic</li> <li>☑ (j) A Reconciliation, including appropriate Computation for Determination of th</li> <li>☐ (k) A Reconciliation between the auditor consolidation.</li> <li>☑ (l) An Oath or Affirmation.</li> <li>☐ (m) A copy of the SIPC Supplemental Research</li> </ul>	Condition. rs' Equity or Partners' or Sole Proprietors' Capital. Subordinated to Claims of Creditors.  Leserve Requirements Pursuant to Rule 15c3-3. on or Control Requirements Under Rule 15c3-3. ate explanation of the Computation of Net Capital Under Rule 15c3-1 and the ne Reserve Requirements Under Exhibit A of Rule 15c3-3. d and unaudited Statements of Financial Condition with respect to methods of

\*\*For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

# SUNBELT NEW ENGLAND EQUITIES, LLC FINANCIAL STATEMENTS DECEMBER 31, 2007

## BRACE & ASSOCIATES, PLLC

\_Certified Public Accountant\_\_\_\_

PMB 271, 44 NASHUA ROAD, SUITE 15

I ONDONDERRY, NH 03053-3450

TEL. (603) 889-4243

FAX (603) 882-7371

#### **Independent Auditor's Report**

To the Member of Sunbelt New England Equities, LLC Woburn, MA

We have audited the accompanying statement of financial condition of Sunbelt New England Equities, LLC, (the Company) as of December 31, 2007, and the related statements of income, changes in member's equity, and cash flows for the year then ended that you are filing pursuant to rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Sunbelt New England Equities, LLC, as of December 31, 2007, and the results of their operations and their cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in Schedules I and II is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Brace & Associates, PLLC

Certified Public Accountant Londonderry, New Hampshire

Brace & associated, PUL.

February 1, 2008

## STATEMENT OF FINANCIAL CONDITION

#### **DECEMBER 31, 2007**

#### **ASSETS**

Cash and cash equivalents Prepaid expenses	\$ —	29,803 276
Total assets	<u>\$</u>	30,079
LIABILITIES AND MEMBER'S EQUITY		
LIABILITIES: Accounts payable, accrued expenses, and other liabilities	\$	800
Member's equity		29,279
Total liabilities and member's equity	\$	30,079

## STATEMENT OF INCOME (LOSS)

## FOR THE YEAR ENDED DECEMBER 31, 2007

Revenues: Services Other income Interest income	\$ 2,500 35,000 65 37,565
Expenses:  Legal and professional fees Occupancy Other expenses	\$ 24,000 2,400 3,935
	30,335
Net income (loss)	\$ 7,230

## STATEMENT OF CHANGES IN MEMBER'S EQUITY

## FOR THE YEAR ENDED DECEMBER 31, 2007

Member's equity at beginning of year	\$ 8,297
Net income (loss)	7,230
Member's contributions	 13,752
Member's equity at end of year	\$ 29,279

#### STATEMENT OF CASH FLOWS

#### FOR THE YEAR ENDED DECEMBER 31, 2007

Cash flows from operating activities:			<b>5.00</b> 0
Net income (loss)		\$	7,230
Adjustments to reconcile net income			
to net cash provided by operating activities:			
(Increase) decrease in operating assets:			
Decrease in receivables from noncustomers	\$ 536		
Increase (decrease) in operating liabilities:			
Increase in accounts payable, accrued expenses	 200		
Total adjustments			736
Net cash used by operating activities			7,966
Cash flows from investing activities:			
None			-
Cash flows from financing activities:			
Member's contributions			13,752
Net decrease in cash			21,718
Cash at beginning of the year			8,085
Cash at end of the year		<u>\$</u>	29,803
SUPPLEMENTAL DISCLOSURES OF CASH FLOW INFORMATION			
Cash paid during the year for:			
Interest		\$	
Income taxes		\$	-
meome tates		<u> </u>	<del></del>

Disclosure of accounting policy:

For purposes of the statement of cash flows, the Company considers all highly liquid debt instruments purchased with a maturity of three months or less to be cash equivalents.

#### NOTES TO FINANCIAL STATEMENTS

#### **DECEMBER 31, 2007**

#### NOTE 1- SIGNIFICANT ACCOUNTING POLICIES

#### Organization and Nature of Business

The Company was organized on August 5, 2005 as a Massachusetts limited liability company to conduct business as a registered broker-dealer under the Securities Exchange Act of 1934. As a limited liability company the members' liability is limited to their investment. It was formed for the purpose of engaging in the general business of an equities holding company.

#### **Use of Estimates**

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amount of assets and liabilities as of the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

#### NOTE 2- NET CAPITAL

As a broker dealer, the Company is subject to the Securities and Exchange Commission's regulations and operating guidelines, which require the Company to maintain a specified amount of net capital as defined, and a ratio of aggregate indebtedness to net capital as derived, not exceeding 8 to 1. The Company's net capital as computed under Rule 15c3-1, was \$29,003 at December 31, 2007, which exceeded required net capital of \$5,000 by \$24,003. The ratio of aggregate indebtedness to net capital at December 31, 2007 was 2.8%.

#### NOTE 3- INCOME TAXES

The Company has chosen to be treated as a disregarded entity for federal and state income tax purposes. A disregarded entity is not a taxpaying entity for federal or state income tax purposes. Accordingly, no income tax expense has been recorded in the statements. All income or losses will be reported on the individual member's income tax return.

## NOTES TO FINANCIAL STATEMENTS (Continued)

**DECEMBER 31, 2007** 

## NOTE 4- RELATED PARTY TRANSACTIONS

The Company leases its office space from Sunbelt Financial Group, LLC which is owned by the same member as Sunbelt New England Equities, LLC. Rent expense paid to this related party for the fiscal year 2007 was \$2,400. \$800 was due to this related party as of December 31, 2007.

Future minimum lease payments to this related party as of December 31, 2007 are as follows:

Year Ending December 31	Amounts
2008	\$2,400
2009	2,400
2010	<u>1,400</u>
Total	<u>\$6,200</u>

# SUNBELT NEW ENGLAND EQUITIES, LLC SUPPLEMENTARY SCHEDULES FOR THE YEAR ENDED DECEMBER 31, 2007

#### SCHEDULE I

## COMPUTATION OF AGGREGATE INDEBTEDNESS AND NET CAPITAL PURSUANT TO RULE 15c3-1

#### **DECEMBER 31, 2007**

Total ownership equity from statement of financial condition	\$ 29,279
Total nonallowable assets from statement of financial condition	 276
Net capital before haircuts on securities positions	29,003
Haircuts on securities	 
Net capital	\$ 29,003
Aggregate indebtedness:  Total A.I. liabilities from statement of financial condition	 800
Total aggregate indebtedness	\$ 800
Percentage of aggregate indebtedness to net capital	 2.8%
Computation of basic net capital requirement:  Minimum net capital required (12.5% of A.I.)	\$ 100
Minimum dollar net capital requirement of reporting broker or dealer	 5,000
Net capital requirement	 5,000
Excess net capital	 24,003
Excess net capital at 1000%	\$ 28,923

There were no material differences between the audited and unaudited computation of net capital.

#### **SCHEDULE II**

#### SUNBELT NEW ENGLAND EQUITIES, LLC

#### COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS FOR BROKER-DEALER UNDER RULE 15c3-3 OF THE SECURITIES EXCHANGE ACT OF 1934

#### **DECEMBER 31, 2007**

The Company is exempt from the reserve requirements of Rule 15c3-3 as its transactions are limited such that they do not handle customer funds or securities, accordingly, the computation for determination of reserve requirements pursuant to Rule 15c3-3 and information relating to the possession or control requirement pursuant to Rule 15c3-3 are not applicable.

## BRACE & ASSOCIATES, PLLC

Certified Public Accountant\_\_\_\_\_

PMB 271, 44 NASHUA ROAD, SUITE 15

LONDONDERRY, NH 03053-3450

TEL. (603) 889-4243 FAX (603) 882-7371

#### Independent Auditor's Report on Internal Control Structure Required by SEC Rule 17a-5

Member of Sunbelt New England Equities, LLC

In planning and performing our audit of the financial statements and supplemental schedules of Sunbelt New England Equities, LLC, (the Company), for the year ended December 31, 2007, we considered its internal control, including control activities for safeguarding securities, in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on internal control.

Also, as required by rule 17a-5(g)(1) of the Securities and Exchange Commission (SEC), we have made a study of the practices and procedures followed by the Company including tests of such practices and procedures that we considered relevant to the objectives stated in rule 17a-5(g) in making the periodic computations of aggregate indebtedness and net capital under rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

- 1. Making quarterly securities examinations, counts, verifications, and comparisons
- 2. Recordation of differences required by rule 17a-13.
- 3. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control or the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to

future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

Our consideration of internal control would not necessarily disclose all matters in internal control that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control components does not reduce to a relatively low level the risk that error or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, our study and evaluation disclosed that a lack of segregation of function exists. Although this condition may be considered to be a material weakness in internal control, it is a common condition in entities of this size. This condition was considered in determining the nature, timing, and extent of the procedures to be performed in our audit of the financial statements of Sunbelt New England Equities, LLC for the year ended December 31, 2007 and this report does not effect our report thereon dated February 1, 2008.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at December 31, 2007, to meet the SEC's objectives.

This report is intended solely for the information and use of the Members, management, the Securities and Exchange Commission, the National Association of Securities Dealers Regulation, Inc., and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Brace & Associates, PLLC

Certified Public Accountant

Beace & associated, PLLC

Londonderry, New Hampshire

February 1, 2008

